

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KRISTINA MIKHAYLOVA,

Plaintiff,

v.

BLOOMINGDALE’S, INC., BLOOMINGDALE’S, INC. d/b/a BLOOMINGDALE’S AND FORTY CARROTS, BLOOMINGDALE’S, LLC, BLOOMINGDALE’S, LLC d/b/a BLOOMINGDALE’S NEW YORK, MACY’S, INC., MACY’S, INC. d/b/a MACY’S OF NEW YORK, UNITED STOREWORKERS RETAIL, WHOLESALE AND DEPARTMENT STORE UNION AFL-CIO LOCAL 3 a/k/a LOCAL 3 UNITED STOREWORKERS RWDSU/UFCW, DENNIS DIAZ, individually, CHRISTOPHER CASTELLANI, individually, RICHARD LAW, individually, and BOBBY BOOKER, individually,

Defendants.

Case No. 1:19-cv-08927-GDB-SLC

**SUPPLEMENTAL
DECLARATION OF COURTNEY
COX IN FURTHER SUPPORT OF
DEFENDANT’S MOTION FOR
SUMMARY JUDGMENT**

I, Courtney Cox, of full age and ability, hereby declare as follows:

1. This supplemental declaration is submitted in further support of Defendant Macy’s, Inc.’s Motion for Summary Judgment. I am personally familiar with the facts and circumstances stated herein, and I could and would competently testify thereto in a court of law if required.

2. I am currently employed by Defendant Bloomingdale’s, LLC (“Bloomingdale’s” or the “Company”) as a Senior Manager, Labor and Employee Relations (“ERM”) for Bloomingdale’s 59th Street store location. I have been with Bloomingdale’s since July 21, 2019 .

3. In my role, I have access to the personnel information of employees and depend on the trustworthiness of that information in the performance of my job duties. The personnel information is maintained in the ordinary course of business and the information set forth in the

files is either documented by employees who are charged with accurately recording events relating to the employee and ensuring those documents are placed in the online personnel file or by the employees who may update personal contact or other information. The employee information contains the eight digit employee number given to each employee. A different number is given to every employee. The personnel information also lists the job title of the employee and whether they were a manager and exempt or paid hourly/commission.

4. In a sales transaction, the employee who is ringing the sale is listed on the receipt. This information is at the top of the receipt beginning the line that sets forth the time and date of the transaction.

5. The Employee ID numbers below are associated in the Company's personnel system as belonging to the listed employees. The employee's job title is stated. All of these employees were paid hourly or by commission and none were managers.

72163766 – Namata Katongole – Ready-to-Wear Sales – hourly

72064050 – Tyler Rose – Chanel Handbag Sales – hourly

72038562 - Eleanor Dahan – Chanel Handbag Sales – hourly

72160325 – Lisa McKell – Chanel Handbag Sales – hourly

72014739 – Martha Weh – Chanel Handbag Sales - hourly

72157172 – Raquel Zamora – Coats/Swim Sales - hourly

72271908 – Ampara Davis – Chanel Handbag Sales - hourly

72645596 – Kemi Lyles – Chanel Handbag Sales - hourly

72061239 – Holly Attia – Designed Handbag Sales - hourly

72050212 – Azhar Ahmad – Salon Shoes Sales – hourly

72049905 – Rene Grajeda – Designer Shoes Sales – hourly

72063570 – Idress Orya – Chanel Handbags Sales - hourly


72011618 – Marina Smirnov – Woman's Shoes Sales - hourly

72063603 – Angy Lee – Chanel Handbags Sales – hourly

6. The Employee ID number for Denis Diaz is 72069990 and the number for Cathy Younis is 72210559.

Pursuant to 28 U.S.C. §1746(2), I, the undersigned, declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of October 2023 in New York, New York.



Courtney Cox